

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Civil Action No. 2:22-cv-00422-JRG-RSP

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO WITHDRAW
SAMSUNG'S PROPOSED BILL OF COSTS (DKT. NO. 513)**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung") file this Unopposed Motion to Withdraw Samsung's Proposed Bill of Costs (Dkt. No. 513) and would show the Court as follows:

On April 7, 2025, Samsung filed its Proposed Bill of Costs and the accompanying declaration and exhibits (Dkt. No. 513). Following the filing of Samsung's Proposed Bill of Costs, Plaintiff Headwater Research LLC ("Headwater") and Samsung (collectively, "the Parties") met and conferred on the outstanding issues set forth in Samsung's Proposed Bill of Costs. During the meet and confers, Samsung voluntarily agreed to withdraw its Proposed Bill of Costs and refile its Proposed Bill of Costs after satisfying the Court's Standing Order Regarding Bill of Costs meet and confer requirement. Therefore, Samsung's Proposed Bill of Costs is moot. At this time, Samsung respectfully seeks to withdraw its Proposed Bill of Costs from the record.

Counsel for Samsung met and conferred with counsel for Headwater to discuss the substantive relief sought in this Motion, and counsel for Headwater indicated that Headwater is unopposed to the relief sought herein.

Accordingly, Samsung respectfully requests that the Court grant this Unopposed Motion and enter an order withdrawing Samsung's Proposed Bill of Costs from the record.

Dated: April 14, 2025

Respectfully submitted,

s/ *Melissa R. Smith*

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Attorney for Defendants
Samsung Electronics Co., Ltd.
and Samsung Electronics America, Inc.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Samsung met and conferred with counsel for Headwater to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). Counsel for Headwater indicated that Headwater is unopposed to the relief sought in this Motion.

s/ Melissa R. Smith
Melissa R. Smith

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 14, 2025, a true and correct copy of the above document was served on all counsel of record via CM/ECF.

s/ Melissa R. Smith
Melissa R. Smith